

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	
Roy S. Turner	:	Chapter 13
	:	Case No. 22-11127-MDC
Debtor(s)	:	

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY**  
**FILED BY THE BANK OF NEW YORK MELLON**

Debtor, Roy S. Turner, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by The Bank of New York Mellon hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied. Debtor avers payments were not properly applied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.

16. Denied both points A & B.

17. Denied.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: September 7, 2022

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1500 JFK Boulevard Suite #220  
Philadelphia, PA 19102  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Sarah K. McCaffery, Esq.**  
Attorney for Movant *The Bank of New York Mellon*  
Electronic Notice to *smccaffery@hoflawgroup.com*

Dated: September 7, 2022

/s/Brad J. Sadek, Esq.  
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Brad J. Sadek, Esq.  
Attorney for Debtor